## September 22, 2005

## Electronic Filing Via ECFS

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

Re: Interactive Services Network, Inc., d/b/a ISN Telcom

Subscriber Acknowledgment Report (September 22, 2005)

WC Docket No. 05-196

Dear Ms. Dortch:

Attached herewith please find Interactive Services Network, Inc., d/b/a ISN Telcom's Subscriber Notification Report, which is being filed in connection with the Public Notice released August 26, 2005 in WC Docket No. 05-196. Please direct any questions regarding this filing to the undersigned.

Sincerely,

Craig Neeld Consultant to Interactive Services Network, Inc., d/b/a ISN Telcom

cc: Byron McCoy Kathy Berthot

Janice Myles

Best Copy and Printing, Inc.

## Interactive Services Network, Inc., d/b/a ISN Telcom Subscriber Acknowledgement Report (September 22, 2005) FCC WC Docket No. 05-196

A detailed explanation regarding current compliance with the notice and warning sticker requirements *if* the provider did not notify and issue warning stickers or labels to 100% of its subscribers by the July 29, 2005 deadline. Providers expected to update this information include those that were in the process of providing notice and/or stickers to their subscribers, but had not completed the process by July 29, 2005.

The notification process was completed on July 29, 2005. We are experiencing a very low acknowledgement volume to these. Along with the notices, which were sent via email and via regular mail, we sent a sticker with the following language: "CAUTION! E911 service may be limited or not available on this phone." The stickers as well as the letter and emails were sent to all our VoIP customers. The distribution of stickers was completed by August 15, 2005.

A quantification of the percentage of the provider's subscribers that have submitted affirmative acknowledgements as of the date of the September 1 and September 22 reports, and an estimation of the percentage of subscribers from whom the provider does not expect to receive an acknowledgement by September 28, 2005.

ISN has received acknowledgements from 60% of our subscribers. The Company has emphasized the importance of sending the acknowledgement, but we expect that we may not receive any type of acknowledgement from 25% of our subscribers.

A detailed description of any and all actions the provider plans to take towards any of its subscribers that do not affirmatively acknowledge having received and understood the advisory.

ISN has started calling these subscribers in order to inform them of the importance of acknowledging the letters and warnings sent to them. This process began on September 7, 2005. While direct calls to customers have helped to obtain acknowledgements, many subscribers remain difficult to contact.

## Interactive Services Network, Inc., d/b/a ISN Telcom Subscriber Acknowledgement Report (September 1, 2005) FCC WC Docket No. 05-196

A detailed description of any and all plans to use a "soft" or "warm" disconnect (or similar) procedure for subscribers that fail to provide an affirmative acknowledgement by September 28, 2005. The Bureau notes that in their August 10, 2005 reports some providers, such as Teliphone, Inc. and Broadview Networks, Inc., state that they will use a "soft" disconnect procedure to disconnect those subscribers that ultimately do not acknowledge having received and understood the customer advisory. As the Bureau understands it, the soft disconnect procedure will either disallow all non-911 calls or intercept and send those calls to the provider's customer service department. Under this "soft" disconnect procedure, however, calls to 911 will continue to go to the appropriate Public Safety Answering Point (PSAP). A provider's September 1 and September 22 reports must include either a statement that the provider will use a "soft" or "warm" disconnect (or similar) solution as of September 28, 2005, or a detailed explanation of why it is not feasible for the provider to use a "soft" or "warm" disconnect solution, as described above.

ISN will force the routing of the calls to speak to our customer service department. Subscribers will only be able to talk to a dedicated group in our customer service department specialized in informing them of the E911 situation.